

# **EXHIBIT 12**

Skip 2 and 6

1. Identify all persons who have knowledge of the facts and circumstances relating to the claims or defenses in this action and include a brief description of their knowledge. Please include any and all witnesses to the alleged discriminatory and/or retaliatory acts by Defendant.

RESPONSE: unless indicated phone numbers place of work etc are unknown, the persons whom I currently know of include:

**Steve Brown(?)**-Made comments which I categorize as racist: comments in the electrical engineering group chat about Omar Being lazy for taking PTO in comparison to a white team member, jokes in the product introduction team group chat about omar's use of PTO, and asking my whereabouts from Rob.  
**Diana Wilmes**- worked directly under Judy as HR assistant. Privy to performance evaluations, interview evaluations, hiring decisions and compensation for different employees. Worked with recruiters, made most complaints about my attendance and timesheets.

**Judy Talis**- acting administrative officer during majority of my employment with defendant. Knowledge of my racial complaints, sexual complaints, disability complaints, escalation of complaints to PHRC and nature of my work.

Sam Gallagher-

**Jorge Rive**- witness to some off color statements and jokes related to sex or race made by sam during some lunches, and occasionally heard these statements when sam would visit my workdesk. I complained about Jorge aggressively pressing me for details of my "Whereabouts" as relevant to the hostile work environment created by racial harassment/discrimination.

**Julian Jackson**- witness to statements by visiting investor regarding racial hiring practices, witness to brian kennney's behaviors and outburst towards me, recipient of specific work rules and guidelines which I had earlier identified as problematic, witness to another employees comments made about race during their discussion of Dylan Roof trial.

**Omar Jackson**- first and only promoted black employee in defendant's history, originally denied senior title due to "employment gap". Also experienced scrutiny from HR and comments from coworkers. Present for a deal of criticism I received from Rob Rosenberg and other coworkers. First/only employee to tell me of suspected racial differences in pay. Knowledge of my work on the UV project. Witness to his own starting and ending pay as technician and senior technician while at MD.

**Maria Tabutt**- Only supervising female mechanical engineer. Responsible for the Assembly Documents of the 150 and 75kW US and EU cabinets. Knows of some of the Quality and Documentation related work conducted by me during employment with Defendant. Experienced scrutiny and less cooperation from male employees including Bogdan Proca, Rob Rosenberg, and men on the QA team. Listened to locker room talk from John Wolgemuth. Told during performance evaluations that she could not document her supervision of design engineer despite acting as their supervisor without full pay. First/only employee to tell me of gender differences in pay. Received weekly meetings with HR when they complained about hostile environment caused by new Manager which included performance evaluation issue. Witness to her own starting and ending pay and related negotiations while working at MD.

**Frank mcmahon**- Manager of Sam Gallagher. May know about his sexual comments/ pressuring me to go to lunch

**Sam Gallagher**-witness to jokes and comments made by himself, Jorge in relation to race, and himself and Bogdan Proca in relation to gender. witness to his own pay or compensation as R&D engineer.

**Seth Wolgemuth-** Witness to his own initial and post promotion pay as a technician and senior technician with MD.

**Brian Kenney-** Issues with Kenney regarding his treatment of me vs white employees which required intervention, he also had issue with Julians work which was categorized as racially biased.

**Bogdan Proca-** Sexual harassment witness through his own comments and behaviors.

**Mike Russell-** Sexual harassment witness through his own behavior.

**Joren Wendschuh-** Knowledge of all claims made due to direct complaints and “journaling” of notes through messages to him in Teams.

**Brenda –** witness to sexual harassment through behaviors of her QA teammates towards issues escalated by/tasks related to me or Maria.

**Alexandra Heisler-**wrongful termination, racial discrimination in hiring, compensation.

**Patti-** wrongful termination, racial discrimination in hiring, compensation.

**Thaddeus-** in charge of migrating project notes from teamworks to jira, suspected to have seen many details regarding my work/projects

**John Wolgemuth:** witness to his own comments about women made at work.

**Darren**-witness to gender discrimination; witness to his own starting pay as a mechanical engineer.

**Erik Lydick-** witness to gender discrimination; witness to his own starting pay as a mechanical engineer.

**Jerry Frank:** Asked me for consulting work on substrate, also party to comments made in electrical engineering group chat and comments by John Wolgemuth

**Ben –**witness to racial hiring practices. Comments made in defense of his sister’s behavior.

**Jed Tsada-** Knowledge of my work on the UV project

**Dan Hackman-** Witness to sexual harassment through Sam Gallaghers pressuring for lunch, witness to nature of work as well as racial comments made by coworkers. Fired 10 days after I notified company of suit. Likely to use spousal privilege/avoid testifying as we are legally married.

3. Identify all healthcare professionals, including but not limited to, physicians, psychiatrists, psychologists, therapists, social workers, and other healthcare professionals with whom you consulted or from whom you received or sought treatment since 2018, including but not limited to those consulted regarding any injuries or conditions relating to any injuries or conditions relating to this action.

RESPONSE:

Sanul Corrielus

215-383-5900

702 W Girard Ave, Philadelphia, PA 19123

Chantelle Mallory

484-572-4251

201 King of Prussia Rd, Ste 650, Radnor, PA 19087

Yefim Aranbayev

610-853-4350

7922 West Chester Pike, Upper Darby, PA 19082

Christopher Reid  
610-527-8140  
825 Old Lancaster Rd, #370, Bryn Mawr, PA 19010

Gregory C. Bolton Senior  
610-896-4380  
100 Lancaster Ave, Wynnewood, PA 19096

Peter Snyder  
215-662-9905  
51 N 39<sup>th</sup> St, Philadelphia, PA 19104

Gerald Michael Lemole  
215-947-8887  
2771 Philmont Ave, Huntingdon Valley, PA 19006

Tara Bussett  
610-853-1112  
2010 West Chester Pike Suite 350  
Havertown, PA 19083

Avani P. Amin  
610-708-5575  
1502 West Chester Pike Ste 15,  
West Chester, PA 19382

Denis Joffe  
610-527-1604  
825 Old Lancaster Rd #360  
Bryn Mawr, PA 19010

Seth Zwillenberg  
800-346-7834  
5501 Old York Rd Paley, 5501 Old York Building, 2<sup>nd</sup> Floor,  
Philadelphia, PA 19141

Sheri Klock  
484-829-6003  
308 E Lancaster Ave, Wynnewood, PA 19096

Michele Hirsch  
484-476-7255  
306E Lancaster Ave Suite 300,  
Wynnewood, PA 19096

Mary Adefemi  
484-829-6003  
308 E Lancaster Ave, Wynnewood, PA 19096

Jennifer Flom  
610-668-7992  
915 Montgomery Ave 4<sup>th</sup> Floor,  
Narberth, PA 19072

Amy Lundholm  
610-896-8400  
100 E Lancaster Ave #137, Wynnewood, PA 19096

Tony Anene-Maidoh  
302-366-7671  
774 Christiana Rd #202  
Newark, DE 19713

Evelyn Partridge  
856-406-5466  
1717 Meadow St, Philadelphia, PA 19124

Jamie L. Rodden  
610-668-7992  
915 Montgomery Ave 4<sup>th</sup> Floor,  
Narberth, PA 19072

Daniel Yoshor  
215-316-5151  
3400 Civic Center Boulevard  
South Pavilion, 2<sup>nd</sup> Floor, Philadelphia, PA 19104

Stephanie Almeida  
215-331-1020  
7131 Frankford Ave 2<sup>nd</sup> Floor,  
Philadelphia, PA 19135

Nancy Villanueva  
800-836-7536  
3401 N Broad St Suite D-101, Philadelphia, PA 19140

Tamara Mahr  
215-316-5151  
800 Walnut St 9<sup>th</sup> Floor, Philadelphia, PA 19107

Mary Antoniou  
215-316-5151  
3624 Market St STE 201,  
Philadelphia, PA 19104

Michael E. Post  
610-527-4896

825 Old Lancaster Road Suite 420  
Bryn Mawr, PA 19010

Ryan Whitcomb  
215-855-2693  
700 Horizon Dr Ste 101, Chalfont, PA 18914

Satyen Undavia  
610-446-6900  
301 West Chester Pike #101,  
Havertown, PA 19083

Monika K. Shirodkar  
215-955-1925  
Walnut Towers, 211 S 9<sup>th</sup> St Unit 600,  
Philadelphia, PA 19107

Erik Zeger  
610-645-2494  
100 E Lancaster Ave Suite B20,  
Wynnewood, PA 19096

Mark J. Kotapka  
215-456-6127  
5401 Old York Rd SUITE 400,  
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Katie M. Hawthorne  
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Heart Pavilion, Mezzanine Level, 100 E Lancaster Ave, Wynnewood, PA 19096

Kenneth Shindler  
215-316-5151  
51 N 39<sup>th</sup> St, Philadelphia, PA 19104

Michele Farber  
844-337-6362  
1900 Market St #115, Philadelphia, PA 19103

James J. Evans  
215-955-7000  
909 Walnut St, Philadelphia, PA 19107

Xin C. Wang  
215-257-4900  
920 Lawn Ave, Sellersville, PA 18960

Marianne Ruby  
1015 Chestnut St #601, Philadelphia, PA 19107

4. Identify all chat rooms, blogs, online forums, or social media or networking websites, applications, services, software, or platforms (including but not limited to those involving video sharing, photograph sharing, blogging, messaging, or ephemeral messaging) for 11 which you have or had an account, or which you have used someone else's account to conduct activity, from January 1, 2020 through the present.

RESPONSE: linkedin, facebook, Instagram, indeed, monster, Glassdoor, ziprecruiter, careerbuilder.

5. Identify all persons who provided information used, and all documents reviewed or referenced in answering these interrogatories.

RESPONSE: all persons in section 1 have acted as a source or provided information and or documents referenced in these interrogatories. I am now also considering calling all persons in section 1 as potential witnesses to the case.

7. State the amount of damages you are claiming for each cause of action alleged in the Complaint and how the amount was calculated.

RESPONSE: I am claiming the maximum amount for each cause of action for the combination of compensatory and punitive damages.

8. Describe in detail all facts supporting your demand for punitive damages as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my demand for punitive damages.

9. Describe in detail all facts supporting your claims that Defendant discriminated against you based upon race as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of racial discrimination.

10. Describe in detail all facts supporting your claims that Defendant discriminated against you based upon disability as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of disability discrimination.

11. Describe in detail all facts supporting your claims of sexual harassment as alleged in your Complaint.

RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of sexual harassment.

12. Describe in detail all facts supporting your claims of unlawful termination as alleged in your Complaint. RESPONSE: All facts listed in my motion for summary judgement, complaint, response to defendants motion to dismiss, supporting brief are in support of my claims of unlawful termination.

13. Identify all efforts you have made to find employment beginning in 2017 up to present, with the exception of employment with InductEV, and if applicable, identify by name, address, and telephone number each employer for whom you have worked. RESPONSE: I have not maintained records of every

employment effort from 2017 on. I had fielded numerous recruiter calls screenings, occasional interviews and online resume submissions

Employers

Bryn Mawr College Physics Department  
101 N Merion Ave,  
Bryn Mawr, PA 19010

Modis staffing agency  
1305 Goshen Parkway  
west Chester, PA 19380  
610-793-8735

Pinnacle Technologies Staffing Agency  
2001 US 46 E Waterview Plaza Suite  
310 Parsippany NJ 07054  
646-688-3623

Onboard Services  
50 Millstone Road Building 300  
suite 110  
East Windsor, NJ 08520  
609-945-8000

Insight Global Staffing Agency  
855-485-8853  
1224 Hammond Drive, Suite 1500  
Atlanta, GA 30346

14. Identify all positions held by you prior to your work at InductEV that you believe reflect or provided to you experience that should have been acknowledged by InductEV for purposes of hiring, or at some point during your employment promoting you into the Senior Technician position. With respect to those positions, please identify the employer, your direct 13 supervisor and/or others who are familiar with your employment and as much directory information as you may have, including but not limited to, name, phone numbers, email, etc. RESPONSE:

Research Assistant- Supervised by Michael Noel  
[mnoel@brynmawr.edu](mailto:mnoel@brynmawr.edu)  
610-526-5363

Summer Research Assistant- Supervised by Michael Lim  
856-256-4365  
[lim@rowan.edu](mailto:lim@rowan.edu)

Teaching Assistant- supervised by Mark Matlin email, phone  
[mmatlin@brynmawr.edu](mailto:mmatlin@brynmawr.edu)

Private tutor- Frog tutoring where I worked as an independent contractor  
Frog Tutoring Corporate Office

1751 River Run Suite 200  
Fort Worth, TX 76107  
Phone: (877) 904 0134

General Technician- Ron Henry  
610-436-5203  
linkedin profile  
<https://www.linkedin.com/in/ronald-henry-4094aa67/>

R&D Technician and Associate Investigator Roles-  
Manager Hjalti Skulason-  
805-350-3119  
[Hjalti.skulason@dupont.com](mailto:Hjalti.skulason@dupont.com)  
Supervisor John Allen  
302-287-0391  
[John.allen@dupont.com](mailto:John.allen@dupont.com)

II RF Engineer – Supervisor was Nathan Zedan  
609-929-9608  
I do not know his email address. This is his linked in  
<https://www.linkedin.com/in/nathan-zedan-59163437/>

Katherine McQuoid  
worked with me while at comcast  
[happymcquoid@gmail.com](mailto:happymcquoid@gmail.com)

15. With respect to the allegation in Paragraph 144 of the Complaint, please identify the details of the reclassification of the employees identified including the respective positions; your knowledge of Company needs; and your knowledge of pre-existing qualifications and job tasks in association with the reclassification of each individual. RESPONSE:

I have no further knowledge than what was stated in complaint, or attached as supporting exhibits in my Response to motion to dismiss. All details in my complaint and supporting brief and exhibits are details

of the reclassification that I currently possess. I am constantly searching for new knowledge regarding the same.

16. With respect to the allegation in Paragraph 145 of the Complaint, please identify the details of the reclassification of the employees identified including the respective positions; your knowledge of Company needs; and your knowledge of pre-existing qualifications and job tasks in association with the reclassification of each individual. RESPONSE:

I have no further knowledge than what was stated in that paragraph or attached as supporting exhibits in my Response to motion to dismiss. All details in my complaint and supporting brief and exhibits are details of the reclassification that I currently possess. I am constantly searching for new knowledge regarding the same.